

COOLEY LLP  
MICHAEL A. ATTANASIO (151529)  
(mattanasio@cooley.com)  
BENEDICT Y. HUR (224018)  
(bhur@cooley.com)  
SIMONA AGNOLUCCI (246943)  
(sagnolucci@cooley.com)  
EDUARDO E. SANTACANA (281668)  
(esantacana@cooley.com)  
ARGEMIRA FLOREZ (331153)  
(aflorez@cooley.com)  
NAIARA TOKER (346145)  
(ntoker@cooley.com)  
HARRIS MATEEN (335593)  
(hmateen@cooley.com)  
THILINI CHANDRASEKERA (333672)  
(tchandrasedkera@cooley.com)  
ISABELLA MCKINLEY CORBO (346226)  
(icorbo@cooley.com)  
CHELSEA HU (357212)  
(chu@cooley.com)  
3 Embarcadero Center, 20th Floor  
San Francisco, CA 94111-4004  
Telephone: (415) 693-2000  
Facsimile: (415) 693-2222

Attorneys for Defendant  
GOOGLE LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

ANIBAL RODRIGUEZ, et al. individually and  
on behalf of all others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 3:20-CV-04688-RS

**DECLARATION OF NAIARA TOKER IN  
SUPPORT OF GOOGLE LLC'S MOTION IN  
LIMINE NO. 17 TO EXCLUDE REFERENCE  
TO INJUNCTIVE RELIEF**

Dept: 3, 17<sup>th</sup> Fl.  
Judge: Hon. Richard Seeborg

Date Action Filed: July 14, 2020  
Trial Date: August 18, 2025

1 I, Naiara Toker, hereby declare as follows:

2 1. I am an associate with the law firm Cooley LLP and am counsel for Defendant  
3 Google LLC in the above captioned action. I am duly licensed to practice law in the state of  
4 California and am admitted to practice before this Court. The matters set forth herein are of my  
5 own personal knowledge, and if called as a witness to testify, I could and would testify to these  
6 matters. I submit this declaration in support of Google's Motion *in Limine* No. 17 to Exclude  
7 Reference to Injunctive Relief, filed concurrently herewith.

8 2. Attached hereto as **Exhibit A** is a true and correct copy of excerpts from the Pretrial  
9 Conference Transcript, Dated July 30, 2025.

10 3. Attached hereto as **Exhibit B** is a true and correct copy of excerpts from the  
11 deposition transcript of Plaintiff Anibal Rodriguez, dated October 16, 2022.

12 4. Attached hereto as **Exhibit C** is a true and correct copy of excerpts from the  
13 deposition transcript of Plaintiff Julian Santiago, dated March 7, 2022.

14 5. Attached hereto as **Exhibit D** is a true and correct copy of excerpts from the  
15 deposition transcript of Susan Harvey, dated October 27, 2022.

16 6. Attached hereto as **Exhibit E** is a true and correct copy of excerpts of the realtime  
17 rough transcript of trial proceedings in the above-referenced proceeding, dated August 20, 2025.

18 I declare under penalty of perjury under the laws of the State of California and the United  
19 States of America that the forgoing is true and correct.

20 Executed on August 20, 2025, at San Francisco, California.

21  
22  
23 /s/ Naiara Toker  
24 Naiara Toker  
25  
26  
27  
28